

Rock Springs EPA Pretreatment Audit

August 9 through August 12, 2010

Preliminary Findings: (Final Findings to be developed during the audit report writing)

1. Update Legal Authority (Municipal Ordinance) and local limits
 - a. EPA will provide the following outreach:
 - i. allocation methods of local limits
 - ii. example language of BMP-based sector control programs
2. Permit template deficiencies:
 - a. correct late report as an SNC criteria (30 days past due date is SNC)
 - b. include additional monitoring to be reported
 - c. certification statement (reporting requirement) needs to be equivalent to Federal Regs
 - d. Certification statement may not be enforceable (options)
 - i. use language similar to lab certification requirement “submit signed and certified” compliance report, including certification statement
 - ii. (preferable) include certification statement as a reporting condition
3. Sampling procedures
 - a. Develop master sampling schedule for year
 - b. Develop sampling protocols specific to each facility to ensure sampling is
 - i. Representative of the production day’s discharge and
 - ii. Sampling techniques are consistently implemented
 - iii. Ensure sampling event is adequately documented
 - iv. EPA recommends using 1 chain of custody per IU sampling event
4. No SIU sampling for 2008
5. Resampling for violations and additional monitoring need to be reported using the signed certification statement
6. ERP must be consistently implemented
 - a. No enforcement of permit violations of limits or conditions (24-hour reporting, 5-day follow up reporting, and 30 day resampling)
 - b. SNC must be consistently implemented
 - i. i.e., Tri-Mac Transportation – appears to be in SNC for 1st and 2nd Quarter of 2010 for Cd and failure to sample for Cr⁶⁺
7. Inspection reports need to be signed and dated
8. RV dump Station – ensure the recorded tapes are consistently reviewed to ensure adequate usage
9. EPA will provide additional waste manifests
10. Evaluate service area and Industrial waste inventory for contributors of pollutants causing or contributing to the H₂S at the collection system and at the POTW

Permit Specific Findings

11. The City needs to ensure the issued permits are signed by the authorized responsible official.
12. Tri-Mac:
 - a. Recommend fact sheet be developed
 - b. Permit application not date stamped
 - c. 17 violations not addressed (need to address according to ERP)
 - i. 1 late report - , need to evaluate for enforcement according to ERP
 - ii. 9 Cd - , need to evaluate for enforcement according to ERP
 - iii. 6 – Cr⁶⁺ - , need to evaluate for enforcement according to ERP
 - iv. 1 – pH - , need to evaluate for enforcement according to ERP
 - d. Unclear if the IU met the 24 reporting for violations, , need to evaluate for enforcement according to ERP
 - e. No 5-day report for violations(violation of permit condition), , need to evaluate for enforcement according to ERP
 - f. Unclear if the IU met the 30 day resampling requirement, , need to evaluate for enforcement according to ERP
13. Sweetwater County Hospital:
 - a. Fact sheet – the IU was downgraded to an IU because of flow but is still reported on the annual report as an SIU
 - b. Cl₂ violation – appears to be SNC for 1st Quarter 2009
 - i. No 24 hour notice documentation, , need to evaluate for enforcement according to ERP
 - c. Permit indicated slug control plan but no documentation
 - d. SMR – late report on 04/10/09 – no enforcement, , need to evaluate for enforcement according to ERP
 - e. Permit expired – May 2010, discharging without a permit, need to evaluate for enforcement according to ERP
 - f. BTES, FOG, TPH – required to sample 2/year, no 2009 data, need to evaluate for enforcement according to ERP
14. Weatherford:
 - a. Cu violation on 06/03/09, , need to evaluate for enforcement according to ERP
 - b. No 24-hour notification, 5 day reporting, 30 day resampling documentation, , need to evaluate for enforcement according to ERP
 - c. Spill containment issues for parts washer, antifreeze,
 - d. Poor O+M on treatment system, leaking hoses
15. Haliburton:
 - a. Permit requires monthly reporting however the SMR is reported quarterly
 - b. Explosives building – evaluate for significance and document in fact sheet
16. Terracon:
 - a. 01/09/10 and 10/09/09 – no lab certification (permit violation) , need to evaluate for enforcement according to ERP